

Exhibit A

DISCOVERY PLAN WORKSHEET
Phase I (Pre-Settlement Discovery)

Deadline for completion of Rule 26(a) initial disclosures
and HIPAA-complaint records authorizations: November 15, 2017

Completion date for Phase I Discovery
as agreed upon by the parties: January 8, 2018
(Presumptively 60 days after Initial Conference)

Phase II Discovery and Motion Practice

Motion to join new parties or amend the pleadings: February 2, 2018

First requests for production of documents
and for interrogatories due by: February 19, 2018

All fact discovery completed by: June 4, 2018

Exchange of expert reports completed by: Plaintiff By: July 9, 2018
Defendant By: August 8, 2018

Expert depositions completed by: September 7, 2018

COMPLETION OF ALL DISCOVERY BY:
(Note: Presumptively 9 months after Initial Conference.) September 8, 2018